



STATE OF CONNECTICUT

STATE DEPARTMENT OF EDUCATION



Connecticut General Assembly Children's Committee Testimony of Acting Commissioner Charlene Russell-Tucker March 9, 2021

Good morning Representative Linehan, Senator Anwar, Senator Martin, Representative Dauphinais, and members of the Children's Committee. I am Charlene Russell-Tucker, Acting Commissioner with the Connecticut Department of Education (Department). I am sorry that I am unable to join you virtually today, but I, along with key members of my team, will be testifying before the Appropriations Committee for our initial budget hearing. We would like to offer you the following written testimony on **SB 2, An Act Concerning Social Equity And The Health, Safety And Education Of Children** and offer to schedule a meeting with any members of this Committee to work through some of the concerns we have with this proposal.

Sections 11, 12 & 13 – pertain to social-emotional learning. The first integrates social-emotional learning throughout the professional development series for certified staff. The second section requires each school district's Professional Development and Evaluation Committee to include social-emotional learning in the district professional development plan for certified employees of the district. Lastly section 13 requires the integration of social-emotional learning in the local district's education goals for the district. While we are supportive of social-emotional learning for school staff, without additional resources, this could prove to be a burden to local districts.

Section 14 – The Department is supportive of the requirement that parents be extended an option to attend any parent-teacher conference via phone, video conference, or virtual platform.

Related to the requirements for assessing a students' safety or hardships in their home the Department believes this is redundant, as teachers are already mandated reporters and, furthermore, this appears intrusive. Teachers work with student support personnel (school counselors, social workers, school psychologists and school nurses) to assist students who may be in need. The Department ensures there is support and guidance for engaging families, including the [Full, Equal and Equitable Partnerships: Connecticut's Framework for Family Engagement](#); created and engages with the [Commissioner's Roundtable for Family and Community Engagement in Education](#); and conducts a number of family engagement initiatives and trainings to provide professional development and support for school staff to ensure meaningful and effective family engagement. The Department also collaborates with the Department of Children and Families to ensure that districts receive information and assistance in addressing student safety and well-being during hybrid or remote learning models.

Section 15 – requires the Department to develop, and annually update, a document for use by local and regional boards of education that provides information concerning safety, mental health and food insecurity resources and programs available for students and their families. The Department is supportive of this work. We currently already partner with other state agencies, human and youth service agencies, behavioral health providers and anti-hunger organizations to ensure information is available to schools and families. The Department also works with 2-1-1 as the State's portal for information and services. Furthermore, districts develop relationships with

similar agencies and organizations in their communities to be able to provide information on resources that are most accessible to their families.

Sections 16 & 17 – allow local or regional boards of education to authorize use of virtual platforms, or as part of a remote model, instruction to students in grades nine to twelve, so long as the board receives permission for such instruction from the Commissioner of Education, and also specifies the requirements for what constitutes student attendance during such instruction. Similar language exists in other proposals before this Committee and the Education Committee. As indicated in the Department’s testimony on **HB 6508, An Act Concerning Remote Learning Attendance**, we would suggest as an alternative either that the legislature direct a committee (that includes the Department) to study and propose universal remote learning standards, or to permit the Commissioner of Education to develop universal implementing rules in lieu of providing permission.

To facilitate the Department’s proposal, we would propose language such as:

Instruction that is conducted on a virtual platform or as part of a remote learning model shall be considered an actual school session, provided that such provision of education is consistent with standards developed by the Commissioner of Education for such instruction. The Commissioner of Education shall develop, and may revise as necessary, such standards for local and regional boards of education to provide instruction that is conducted on a virtual platform or as part of a remote learning model which when complied with shall be considered an actual school session. The remote learning standards shall not be deemed to be regulations, as defined in section 4-166.

Additionally, we respectfully request that the mandate that a local board specify requirements for remote student attendance must also direct the local board to make such a policy in line with the State Board of Education policy and guidelines issued by the Department on this topic. Our guidance indicates that a remote student can be considered as being ‘in attendance’ on a particular day if the total time spent on one or more of the following activities equals at least half the school day: (1) Synchronous virtual classes; (2) Synchronous virtual meetings; (3) Time logged in electronic systems, and (4) Assignment submission/completion. Maintaining a standard statewide attendance policy/definition will continue to position Connecticut as a national leader in utilizing data for accountability purposes, as well as to design prevention and intervention strategies and supports for school, districts, family and community engagement.

Section 18 – requires the State Board of Education to amend the definitions of "excused absence" and "unexcused absence" to exclude (1) school lessons that are conducted on a virtual platform or as part of a remote learning model, and (2) a student's absence resulting from such student's taking a mental health wellness day. To the extent this bill language suggests that attendance (or lack of attendance) in remote or virtual classes would not count towards traditional student attendance data, the Department is not in support of this language. If the school is offering remote learning and the student is absent, then it needs to be categorized as an excused-remote or an unexcused-remote per our guidance. It should not be treated any differently than a regular school day, particularly as it is counted toward the requirement for 180 days of instruction as proposed in other bill language, and may in some cases be used toward graduation credits.

Further, it is important to remember that a key purpose for tracking attendance is to monitor lost instruction and to know if a student or group of students require added support. The ability to respond effectively is lost if attendance information is not available. We would be happy to work with you on bringing this proposal into alignment with State Board of Board policy and Department guidance. Of note, this section also refers to Section 21 related to mental health wellness days, but appears to be referencing Section 19. Lastly, we would like to note that current policy permits up to nine absences in a school year that can be deemed excused for any reason the parent or guardian provides, this includes for health reasons - physical or mental health. Therefore, there is no need for additional legislation.

Section 19 – requires a local or regional board of education to permit any student enrolled in grades kindergarten to twelve, inclusive, to take up to four mental health wellness days during the school year, during which day such student shall not be required to attend school. While the Department agrees with and understands the importance of supporting student mental health, allowing students to remain home from school does not necessarily achieve the outcome of improving the student’s well-being. Schools are equipped to support students experiencing mental health issues including those impacted by trauma and work to provide supports to students and families.

Additionally, we are concerned that the extent of a student’s mental state may not be known if they are not in school, and there may be adverse outcomes if the child is allowed to remain out of school. The student will also lose valuable instruction time. Furthermore, if the student is counted as “in attendance” during a mental health wellness day, then the school remains responsible for that student and it becomes challenging for schools to know which students are actually in the school building during school hours and which are not for the purpose of emergencies and school safety. Attendance policies that restrict access to extracurricular activities would also conflict with this policy. In order to properly activate engagement and support tools used by schools, it is vital that our schools are aware of students missing school days for any reason. Beyond providing individual support, if a number of students are taking wellness days, the school may need to assess the reasons and take steps to address school climate and the overall school environment.

Section 20 - requires the Department collect data concerning adverse childhood experiences suffered by students through the Public School Information System (PSIS) and **Section 21** requires districts to submit a strategic school profile report which will now include “adverse childhood experiences, as defined in section 10-10a, as amended by this act, suffered by students”. As was provided in the Department’s testimony on **HB 5698, An Act Concerning The Collection And Reporting Of Adverse Childhood Experiences Data**, this proposal establishes a new data collection for the Department combined with new reporting requirements in the profile report for each district pertaining to adverse childhood experiences data. This is not information that is currently collected by the Department. Additional resources would be needed. We believe this will also be a new data collection for districts, which may be difficult given all of the additional reporting they are currently required to do during the pandemic.

We are also concerned with the potential re-traumatization of students who would need to disclose instances of violence or abuse that would not be a matter of public record like a parent being incarcerated or parents who have divorced. As an alternative to initiating a yearly collection from the start without knowing the impact of this collection and what information the data will yield,

we believe if the Department were given the additional resources, we could convene a taskforce with stakeholders in education, behavioral health, the medical field, and other relevant partners to study this issue and develop recommendations for moving forward without causing further unintended trauma for students and families. As reported by the Centers for Disease Control and Prevention, adverse childhood experiences are linked to chronic health problems and can also negatively impact educational outcomes. The Department understands the role of safe, stable, nurturing relationships and environments to help all children reach their full potential. Therefore, we look forward to working with you on this proposal moving forward.

Section 25 (and related conforming changes) – requires the Commissioner of Early Childhood to adopt regulations to provide early intervention services to children five years of age and under. The Department supports the testimony submitted by the Office of Early Childhood (OEC) on this topic, which notes this section is premature and makes other suggestions to support the intent of this language. In addition, should an expansion of the services provided to our youngest students move forward, we would want to engage further to ensure any proposals related to students over the age of 3 years old were drafted consistent with the requirements under the Individuals with Disabilities Education Act (IDEA) related to the responsibilities of local educational agencies and funding opportunities.

Section 44 – requires the Commissioner of Education to establish an Internet access grant program to award grants to local and regional boards of education to purchase broadband Internet access service or Wi-Fi hotspots for the purpose of providing students, educators and staff with reliable internet access during school sessions that are conducted on a virtual platform or as part of a remote learning model. This is duplicative and funding for this program is not included in the Governor's recommended budget. Under the Everybody Learns Initiative, Connecticut is investing millions of dollars to provide broadband and cellular Wi-Fi hotspot access for at least one year. After that, solutions to Internet access should not be siloed with a new separate pot of money, grant program, and reporting requirements; a comprehensive systems approach is best. This will be unnecessarily burdensome for districts and the Department. Connectivity is one of the challenges (along with devices, PD, etc.) that will need to be addressed for remote learning situations going forward. Districts are receiving millions of dollars from the federal government and the Department has identified as one priority for that funding continued focus on access to devices and connectivity. Therefore, districts can use those funds to address connectivity needs of students and staff. There are also national broadband vouchers/credits available for individuals from low socio-economic statuses. Additionally, the proposed broadband bill is also asking for an assessment of connectivity needs with an accompanying report to the General Assembly. The annual reporting requirement here in SB 2 is redundant.